

EXHIBIT 17

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO, LLC; OTTO

TRUCKING LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEO DEPOSITION OF DANIEL GRUVER

San Francisco, California

Friday, August 4, 2017

Volume II

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2671821

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1 A. I would say in person, then text message, 04:51
2 then email.

3 Q. He was not a -- Anthony is not a big
4 emailer; is that fair?

5 A. That's fair. 04:51

6 Q. He prefers to talk in person or via text
7 message?

8 A. I would say that's true.

9 MR. JAFFE: Okay. All right. Let's mark
10 as Exhibit 517 UBER00177325. 04:51

11 (Exhibit 517 was marked for
12 identification by the court reporter and is
13 attached hereto.)

14 Q. (By Mr. Jaffe) Mr. Gruver, do you see
15 this text message from you to Mr. Levandowski? 04:52

16 A. I do.

17 Q. And this is time-stamped October 23rd,
18 2016?

19 Do you see that?

20 A. Uh-huh. 04:52

21 Q. And you're asking Mr. Levandowski if he
22 got a chance to talk to James.

23 What were you referring to?

24 A. From the text, it appears that -- as
25 James was the head of the LiDAR program, probably 04:53

1 talking to -- having James and Anthony talk about 04:53
2 working on a diode laser system versus another type
3 of system.

4 Q. But am I correct that you were saying a
5 chance to talk to James and you were referring to 04:53
6 some prior conversation that you had with
7 Mr. Levandowski?

8 A. It may be referencing a conversation I
9 had with James. I am not sure.

10 Q. Let me ask it this way: Why did you -- 04:53
11 why you were asking if Anthony had a time (sic) to
12 talk with James, as here in Exhibit 517?

13 A. I believe it was in reference to a
14 discussion James may have had with Eric and Scott
15 and wondering if Anthony was aware of that 04:54
16 discussion.

17 Q. And "Eric," who does that refer to in
18 this text message in 517?

19 A. Eric Meyhofer.

20 Q. And what was his position at the time of 04:54
21 this text message --

22 A. I believe --

23 Q. -- October 23rd, 2016?

24 A. I believe he was hardware lead.

25 Q. Okay. And Scott Boehmke, is that who the 04:54

1 element to the message I'm talking about. 05:11

2 Q. Okay.

3 A. But it appears from my follow-up that I
4 sent him both.

5 Q. So you understood him to -- referring to 05:12
6 both the transmit board and the timing board.

7 A. Unclear of which one, so I -- it appears
8 I sent him both.

9 Q. But he said, "Send me a picture," when
10 you talked -- when you sent him a text about the 05:12
11 working transmit board and timing board for Fuji.

12 A. Right.

13 Q. And if we look at the one here in
14 Exhibit 518, Bates-labeled 360, this is a Fuji
15 transmit board, correct? 05:12

16 A. Sorry. Page 360?

17 Q. Yeah. This one.

18 A. Yes.

19 Q. And is this transmit board that you sent
20 Anthony Levandowski, is this consistent with the 05:12
21 transmit board that we looked at before,
22 Exhibit 512?

23 A. They appear similar.

24 Q. This is the same design as described here
25 in Exhibit 512, the one that you sent 05:13